

Violet Elizabeth Grayson (VEG-2792)
888 Seventh Avenue – 45th Floor
New York, N.Y 10106
(646) 406-1512

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Theresa Guirlando, : ECF Case
: No. 07 Civ. 10266 (RJS)
Plaintiff, : DECLARATION OF
-against- : JOAN ATWOOD, Ph.D.
T.C. Ziraat Bankasi A.S., :
: Defendant. :
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I, Joan Atwood, declare:

1. I am a Licensed Social Worker and a Licensed Marriage and Family Therapist.

I also hold a doctoral decree in Social Psychology and am President and Director of Marriage and Family Therapy of New York. I have 30 years of experience as a psychotherapist. I made this Declaration in Opposition to Defendant Ziraat Bank's motion to dismiss this action in favor of a trial in Turkey.

2. I evaluated Ms. Guirlando in order to assess whether she would be able to travel to Turkey for a court date. In my opinion, such travel (flight, location and all) would be extremely detrimental to Ms. Guirlando's state of mental health.

3. Ms. Guirlando suffers from a severe form of Post Traumatic Stress Disorder (PTSD). This disorder is a direct result of her experiences with her husband, Mr. Mevlut Cicek and loss of her life savings.

4. Post-Traumatic Stress Disorder (PTSD) is a debilitating condition that follows a terrifying event. The typical symptoms are that people with PTSD have persistent frightening thoughts and memories of their ordeal and feel emotionally numb. The event that triggers PTSD may be something that threatened the person's life or wellbeing or the life of someone close to him or her. Whatever the source of the problem, people with PTSD repeatedly relive the trauma in the form of nightmares and disturbing recollections during the day.

5. In the case of Ms. Guirlando, she constantly relives the trauma of her experiences in her marriage to Mr. Cicek and his taking her life savings. There is little else she can focus on, as the loss of her money, which was procured from sale of her family home and car, manifests itself in her every activity. In addition, Ms. Guirlando experiences sleep problems to the extent of staying awake all night ruminating over her situation. As part of her PTSD, she is clinically depressed and is experiencing severe panic attacks. These panic attacks with resulting heart palpitations, aggravating her mitral valve leak, have placed her under a cardiologist's care.

6. Anything that reminds Ms. Guirlando of any of the events that took place since she met Mr. Cicek precipitates a panic attack of terrifying proportions. She will not visit her lifelong friends because they live on the same block where she shared a home with Cicek. It brings back too many memories for her to psychologically tolerate. Any incident or surrounding environment that would remind her of the incidents is too

distressing for her to withstand. She is unable to visit places that are remotely related to the trauma she suffered since meeting Mr. Cicek.

8. In addition, she is terrified of Cicek himself, believing that since he has physically harmed others, he could harm her also. Part of the reason she is unable to sleep at night is that she fears for her safety. Seeing Mr. Cicek or returning to Turkey would, in my opinion, precipitate an emotional breakdown.

9. As is typical in PTSD, if the events that precipitated PTSD were triggered by a person rather than an event (e.g. a flood), the symptoms experienced are more severe. Ordinary daily events can serve as a reminder to Ms. Guirlando of the trauma she endured. This triggers flashbacks and intrusive images of what it was like for her in Turkey such as being isolated by Mr. Cicek, a virtual prisoner in a foreign country unable to communicate with American friends and family, and also being manipulated by Mr. Cicek and his family, with implied threats by his relatives – never feeling safe. These flashbacks can last for minutes or hours. When Ms. Guirlando experiences these flashbacks, she is reliving the traumatic events all over again, with resulting panic attacks, depression and terror.

10. It is my professional opinion that Ms. Guirlando should not return to Turkey at any time in the near future. It is my opinion that doing so would precipitate an emotional breakdown. At this time, it is highly recommended that she stay in safe, comfortable and familiar surroundings, in close proximity to her home and family. For her to travel anywhere at this point, particularly Turkey, would be extremely detrimental to her mental health.

The foregoing facts are true of my personal knowledge. Executed under penalty of perjury of the laws of the United States in New York, New York on May 6, 2008.

Ss// Signature on File

Joan Atwood, Ph.D., LMFT, LCSW